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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

No. 08 Civ. 10922 (DAB)


J. EZRA MERKIN AND GABRIEL CAPITAL
CORP. LITIGATION

MOTION FOR PRO HAC ADMISSION

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Defendant BDO USA, LLP, BDO Cayman Islands, and BDO Ltd.
(collectively, "the BDO defendants") move this Court, pursuant to S.D.N.Y.R. 1.3, for an
order admitting Tracy A. Hannan, a member of the Bar of Illinois, pro hac vice.

This motion is made upon the annexed declaration of Ira G. Greenberg,
dated the 27th day of July, 2012, together with the exhibit thereto.

Dated: New York, NY
July 27, 2012


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TO:

All counsel

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

No. 08 Civ. 10922 (DAB)

J. EZRA MERKIN AND GABRIEL CAPITAL
CORP. LITIGATION

DECLARATION OF IRA G. GREEN-
BERG IN SUPPORT OF
MOTION FOR PRO HAC ADMISSION

-----X

STATE OF NEW YORK)
 : ss:
COUNTY OF NEW YORK)

IRA G. GREENBERG declares as follows:

1. I am a member of the bar of this Court and of the firm of Edwards Wildman Palmer LLP, attorneys for the BDO defendants. I make this declaration in support of their motion for the admission pro hac vice of Tracy A. Hannan, one of my colleagues and a member of the Bar of Illinois.

2. I have annexed as the exhibit to this declaration a certificate of her good standing in Illinois. I am advised that she is admitted only in that jurisdiction.

3. I have worked with Ms. Hannan on other matters. From my personal knowledge she observes the highest standards of professionalism and of ethical conduct.

4. Ms. Hannan understands that she must be familiar and comply with the standards of professional conduct imposed on members of the New York bar, including the rules of this Court and the Rules of Professional Conduct, and that she will be subject to the jurisdiction of the Court with respect to her participation in this case.

5. I shall remain an attorney of record and lead counsel if the Court grants this application.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, NY, on the 27th day of July, 2012.



IRA G. GREENBERG

Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Tracy Adelle Hannan

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on May 6, 2004 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Tuesday, July 17, 2012.

Carolyn Taft Grosboll

Clerk

CERTIFICATE OF SERVICE

I certify that on the 27th day of July, 2012, I caused a true copy of the attached motion to be served on the following by first-class mail:

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IRA G. GREENBERG